

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION DIVISION
CIVIL ACTION NO. 9:10-CV-3227-SB

Marcos Bognar,)
Andrew Skorjanc,)
Paul C. Liebrecht,)
on behalf of themselves and all)
others similarly situated,)
Plaintiffs,) MOTION TO DISMISS
vs.) PLAINTIFF'S FIRST AMENDED
Town of Ridgeland,) COMPLAINT OR, IN THE
Ridgeland Police Department,) ALTERNATIVE, FOR
Gary Hodges,) SUMMARY JUDGMENT
Richard V. Woods,)
iTraffic Safety, LLC,)
Defendants.)

TO: ALL COUNSEL:

PLEASE TAKE NOTICE that the Defendants, Town of Ridgeland, Ridgeland Police Department, Gary Hodges, and Richard V. Woods by and through their undersigned attorney, shall, and hereby do, move this Honorable Court for an Order dismissing the above captioned case or, in the alternative, for summary judgment upon the grounds that there exists no genuine issue as to any material fact and that the Defendants are entitled to judgment as a matter of law.

This Motion is based upon the pleadings in the within action, memorandum in support of this motion and attachments thereto, upon Rule 56 of the Federal Rules of Civil Procedure, and upon such additional law and argument as shall be appropriate.

CLAWSON & STAUBES, LLC

s/Timothy A. Domin

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Ridgeland Police Department, Gary Hodges, and
Richard V. Woods

June 27, 2011